

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION**

R.A.Jr., (a minor child, by and through his )  
Father and next best friend, Richard Lemmel )  
Arnold, )  
Plaintiff, )  
v. ) Case No.: 3:06-CV-337-WHA  
DEPUTY SHERIFF WALTER LACEY, )  
in his official and individual capacity )  
Defendant. )

**MOTION ASKING FOR PERMISSION TO FILE  
DEPOSITION EXHIBITS UNDER SEAL**

**COMES NOW**, the Plaintiff, by and through his attorney of record, Arlene M. Richardson and would file this Motion asking for permission to file the deposition exhibits which are included in the Plaintiff's Response to the Defendant's Motion for Summary Judgment under seal and in support of would state as follows:

1. That the Plaintiff filed her Response to the Defendant's Motion for Summary Judgment on January 29, 2007;
2. That the Plaintiff cited to the depositions of the parties and other witnesses in her response;
3. That the depositions filled with names and other protected information concerning minors;
4. That the Plaintiff is requesting permission to file the deposition exhibits under seal to protect the privacy of the minors involved;
5. That the Plaintiff is sending a hardcopy to the court which includes all parts of the depositions.

**WHEREFORE PREMISES CONSIDERED**, the Plaintiff prays that this Honorable Court grant her request for permission to file the deposition exhibits under seal and only include them in the hardcopy that is submitted to the Court.

Respectfully submitted this the 29<sup>th</sup> day of January, 2007.

**s/Arlene M. Richardson**  
Bar Number ASB 9452-I60A  
Attorney for the Plaintiff  
**Richardson Legal Center, L.L.C.**  
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**CERTIFICATE OF SERVICE**

I hereby certify that on January 29, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

C. Winston Sheehan, Jr. [wsheehan@ball-ball.com](mailto:wsheehan@ball-ball.com), [rsmith@ball-ball.com](mailto:rsmith@ball-ball.com)

And certify that I have hereby mailed by United States Postal Service the document to the following non-CM/ECF participants:

NONE  
Respectfully submitted,

**s/Arlene M. Richardson**  
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